

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

| | | |
|---|---|---------------------------|
| LA UNIÓN DEL PUEBLO ENTERO, <i>et al.</i> , | § | |
| | § | |
| <i>Plaintiffs,</i> | § | |
| | § | |
| V. | § | |
| | § | |
| STATE OF TEXAS, <i>et al.</i> , | § | Case No. 5:21-cv-00844-XR |
| | § | [Lead Case] |
| <i>Defendants.</i> | § | |
| | § | |
| HARRIS COUNTY REPUBLICAN PARTY, <i>et al.</i> , | § | |
| | § | |
| <i>Intervenor-Defendants.</i> | § | |

PLAINTIFFS’ MOTION FOR EXTENSION OF TIME

Through this motion, Plaintiffs¹ request a three-day extension of the August 22, 2023 deadline to file a Final Joint Pretrial Order. *See* Transcript of July 11, 2023, Hearing at 39:22-44:4 (adopting the parties’ Joint Advisory, Dkt. 615).

1. Plaintiffs seek the extension, until August 25, 2023, in light of the Court’s recent Summary Ruling on Section 101 Materiality Claims and Order on Pretrial Filings.” *See* Dkt. 724.
2. Plaintiffs are analyzing the Court’s order granting partial summary judgment and considering which claims and evidence they plan to present in the upcoming trial.

¹ Plaintiffs are: La Union del Pueblo Entero, Southwest Voter Registration Education Project, Mexican American Bar Association of Texas, Texas Hispanics Organized for Political Education, JOLT Action, William C. Velazquez Institute, FIEL Houston Inc., Friendship-West Baptist Church, Texas Impact, James Lewin; OCA-Greater Houston, League of Women Voters of Texas; Revup-Texas, And Workers Defense Action Fund, Houston Area Urban Leage; Delta Sigma Theta Sorority, Inc.; The Arc Of Texas; Jeffrey Lamar Clemmons; Mi Familia Vota, Marla López, Marlon López, and Paul Rutledge, LULAC Texas, Voto Latino, Texas Alliance For Retired Americans, and Texas AFT.

3. Plaintiffs are also mindful of the Court's renewed instruction to review carefully and cull their witness list. *Id.* at 7. Plaintiffs are in the process of reexamining their trial plan and seek the same deadline for their revised witness list as for the Final Joint Pretrial Order.
4. The three-day extension is not sought for the purpose of delay and will not prejudice any party.

For the foregoing reasons, Plaintiffs request an extension, until August 25, 2023, of their deadline to file a Final Joint Pretrial Order.

Dated: August 18, 2023

Respectfully Submitted,

/s/ Nina Perales

Nina Perales (TX Bar No. 24005046)
Julia R. Longoria (TX Bar No. 24070166)
Fátima L. Menéndez (TX Bar No. 24090260)
Kenneth Parreno (MA BBO No. 705747)
MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND
110 Broadway, Suite 300
San Antonio, TX 78205
Telephone: (210) 224-5476
Facsimile: (210) 224-5382
nperales@maldef.org
jlongoria@maldef.org
fmenendez@maldef.org
kparreno@maldef.org

Michael C. Keats*
Rebecca L. Martin*
Jason S. Kanterman*
Kevin Zhen*
FRIED, FRANK, HARRIS, SHRIVER &
JACOBSON LLP
One New York Plaza
New York, New York 10004

/s/ Sean Morales-Doyle

Sean Morales-Doyle (NY Bar No. 5646641)
Patrick A. Berry (NY Bar No. 5723135)
Jasleen K. Singh (CA. Bar No. 316596)
Eliza Sweren-Becker (NY Bar No. 5424403)
Andrew B. Garber (NY Bar No. 5684147)
BRENNAN CENTER FOR JUSTICE AT
NYU SCHOOL OF LAW
120 Broadway, Suite 1750
New York, NY 10271
Telephone: (646) 292-8310
Facsimile: (212) 463-7308
sean.morales-doyle@nyu.edu
patrick.berry@nyu.edu
jasleen.singh@nyu.edu
eliza.sweren-becker@nyu.edu
andrew.garber@nyu.edu

Leah J. Tulin* (MD No. 0812180236)
BRENNAN CENTER FOR JUSTICE AT NYU
SCHOOL OF LAW
1140 Connecticut Avenue NW, Suite 1150
Washington, DC 20036
(202) 650-6397
tulini@brennan.law.nyu.edu

Paul R. Genender (TX Bar No. 00790758)

Telephone: (212) 859-8000
Facsimile: (212) 859-4000
michael.keats@friedfrank.com
rebecca.martin@friedfrank.com
jason.kanterman@friedfrank.com
kevin.zhen@friedfrank.com

Attorneys for Plaintiffs

**LA UNIÓN DEL PUEBLO ENTERO,
SOUTHWEST VOTER REGISTRATION
EDUCATION PROJECT, MEXICAN
AMERICAN BAR ASSOCIATION OF
TEXAS, TEXAS HISPANICS
ORGANIZED FOR POLITICAL
EDUCATION, JOLT ACTION,
WILLIAM C. VELASQUEZ INSTITUTE,
FIEL HOUSTON INC**

**Admitted pro hac vice*

Elizabeth Y. Ryan (TX Bar No. 24067758)
Matthew Berde (TX Bar No. 24094379)
Megan Cloud (TX Bar No. 24116207)
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, Texas 75201
Telephone: (214) 746-8158
Facsimile: (214) 746-7777
paul.genender@weil.com
liz.ryan@weil.com
matt.berde@weil.com
megan.cloud@weil.com

**COUNSEL FOR
FRIENDSHIP-WEST BAPTIST
CHURCH, ANTI-DEFAMATION
LEAGUE AUSTIN, SOUTHWEST, AND
TEXOMA, TEXAS IMPACT, JAMES
LEWIN**

**Admitted pro hac vice*

CERTIFICATE OF CONFERENCE

I hereby certify that, on August 17, 2023, counsel for LUPE Plaintiffs emailed all parties and sought their position on the instant motion. Counsel for Plaintiffs are unopposed. Counsel for Defendants did not respond by the time this motion was filed.

/s/ Nina Perales

Nina Perales

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 18th day of August, 2023.

/s/ Nina Perales
Nina Perales